

EXHIBIT 16

Geyer, Kate

From: Paige Stradley <PStradley@MerchantGould.com>
Sent: Thursday, May 15, 2025 4:04 PM
To: Geyer, Kate; RothschildMGTeam
Cc: ValveKTService; Ariel O. Howe
Subject: RE: Valve v. Rothschild, 2:23-1016-JNW: LCR 37 Joint Submission - Valve's Opening Portion

****CAUTION: External Email****

Kate,

We disagree with several of the characterizations in your email. In any event, our team does have scheduling issues such that a 7-day turn-around time is not feasible for us. Given that you will not agree to the normal 15-day response time provided for under the motion to compel process (which is also the amount of time it took your team to prepare your positions following our meet and confer), we will have to move forward with the standard motion to compel process. We will look for your team to file that brief, and we will respond accordingly.

Regards,
Paige

Paige Stradley
she/her/hers
Partner
Merchant & Gould P.C.
150 South Fifth Street
Suite 2200
Minneapolis, MN 55402-4247
USA

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Operating as Merchant & Gould, LLP, in California.

Please consider the environment before printing this email. Thank you.

From: Geyer, Kate <KGeyer@ktslaw.com>
Sent: Wednesday, May 14, 2025 8:35 PM
To: Paige Stradley <PStradley@MerchantGould.com>; RothschildMGTeam <RothschildMGTeam@MerchantGould.com>
Cc: ValveKTService <ValveKTService@kilpatricktownsend.com>; Ariel O. Howe <ahowe@merchantgould.com>
Subject: RE: Valve v. Rothschild, 2:23-1016-JNW: LCR 37 Joint Submission - Valve's Opening Portion

CAUTION - External.

Hi Paige –

No, we will not agree to any further delays in resolving the issues in the case. The purpose of using the expedited process is to ensure expedient resolution of the issues, which is necessary given the June 25 close of fact discovery. Defendants previously agreed to use this procedure, and the Court's Chamber Rules "urges the parties to use the District's Expedited Joint Motion Procedure for discovery disputes."

Moreover, Defendants have been aware of Valve's positions since its April 17 letter which we further expanded upon in the April 30 meet and confer. In addition, you have been on notice of Valve's intent to move to compel since May 8. This is plenty of time to develop Defendants' response to Valve's positions on the expedited timeline.

If there is a legitimate conflict that affects your full team's ability to respond in seven days, we will of course consider a request for reasonable extensions as we have in the past. However, your request does not appear to be based on any legitimate conflict but instead appears to be a request to brief the issues on the LCR 7(d)(3) schedule, obviating the purpose of the *expedited* joint motion procedure.

If Defendants will not agree to use the Joint Procedure without modification, please confirm that **tomorrow** so that we can refile the motion tomorrow and note Defendants' refusal.

Kate Geyer

KGeyer@ktslaw.com

Kilpatrick Townsend & Stockton LLP

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From: Paige Stradley <PStradley@MerchantGould.com>

Sent: Wednesday, May 14, 2025 3:46 PM

To: Geyer, Kate <KGeyer@ktslaw.com>; RothschildMGTeam <RothschildMGTeam@MerchantGould.com>

Cc: ValveKTSservice <ValveKTSservice@kilpatricktownsend.com>; Ariel O. Howe <ahowe@merchantgould.com>

Subject: RE: Valve v. Rothschild, 2:23-1016-JNW: LCR 37 Joint Submission - Valve's Opening Portion

Kate,

Defendants never agreed to use the truncated, joint submission process with respect to these disputes. Defendants will agree to use the truncated, joint submission process if Valve agrees to provide Defendants with the normal 15 day turn-around time provided for in connection with motions to compel. That would make Defendants' responsive position due May 28th.

Best,

PSS

Paige Stradley

she/her/hers

Partner

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From: Geyer, Kate <KGeyer@ktslaw.com>

Sent: Tuesday, May 13, 2025 11:16 PM

To: RothschildMGTeam <RothschildMGTeam@MerchantGould.com>

Cc: ValveKTSservice <ValveKTSservice@kilpatricktownsend.com>

Subject: Valve v. Rothschild, 2:23-1016-JNW: LCR 37 Joint Submission - Valve's Opening Portion

CAUTION - External.

Counsel:

Attached please find Valve's opening portion of the LCR 37 Joint Submission to compel Defendants Leigh Rothschild; Rothschild Broadcast Distribution Systems, LLC; Display Technologies, LLC; and Patent Asset Management, LLC (collectively, the "Rothschild Defendants"), shall produce all documents, communications, and things responsive to the following discovery requests:

- RBDS Request Nos. 34, 35, and 37 and Interrogatory No. 5
- DT Request Nos. 29, 30, and 32
- PAM Request Nos. 49, 50, and 52
- Rothschild Request Nos. 52, 53, and 55

The Joint Submission also seeks to compel the Rothschild Defendants to produce all ESI responsive to the following search terms:

- Infringe OR infringes OR infringement OR infringing OR infringer OR demand OR threat OR assert OR target OR campaign OR enforce OR sue OR lawsuit
- Settlement OR license OR agreement

Limited in time to before June 7, 2023

To be run on Outlook for Defendants' ESI custodians Daniel Falcucci, Christina Arias, and Defendant Leigh Rothschild



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